

# EXHIBIT A

Julianna Morse  
600 Wood St.,  
Richmondale, PA 18421,

Plaintiff

v.

GC Services, LP  
6330 Gulfon St.  
Houston, TX 77081-1108

Defendant

Court of Common Pleas of  
Lackawanna County – Civil Action

Case No. 13-CV-2676

Jury Trial Demanded

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by plaintiff(s). You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

North Penn Legal Services  
507 Linden Street, Suite 300  
Scranton, PA 18503-1631  
Telephone (570) 342-0184

Lawyer Referral Service  
Lackawanna Bar Association  
204 Wyoming Avenue, Suite 205  
Scranton, PA 18503-1010  
Telephone (570) 969-9600

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### COMPLAINT

#### **I. Introduction**

1. This is an action for damages brought by an individual consumer for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("the Act") which prohibits debt collectors from engaging in abusive, unfair, and deceptive practices.

#### **II. Jurisdiction**

2. Jurisdiction of this Court is proper pursuant to 15 U.S.C. § 1692k(d), which permits an action under the Act to be brought in any court of competent jurisdiction.

3. Venue in this district is proper in that Defendant transacts business here and the conduct complained of is alleged to have occurred here.

#### **III. Parties**

4. Plaintiff, Julianna Morse, is a natural person residing at 600 Wood St., Richmondale, PA 18421.

5. Defendant, GC Services, LP, ("the Collector") is a limited partnership engaged in the business of collecting debts in this state with a place of business located at 6330 Gulfton St. Houston, TX 77081-1108 and is a "debt collector" as defined by the

Act, 15 U.S.C. § 1692a(6).

#### **IV. Statement of Claim**

6. Within the past year the Collector was attempting to collect an alleged account ("the Account") from Plaintiff.

7. The Account is a "debt" as that term is defined by the Act, 15 U.S.C. § 1692a(5).

8. The Collector regularly uses the telephone to attempt to collect consumer debts alleged to be due another.

9. Within the last year, the Collector left at least two telephone messages for Plaintiff.

10. 15 U.S.C. § 1692e(11) requires a debt collector to disclose that the communication is from a debt collector in each communication with a consumer.

11. In both of the messages, the Collector failed to disclose that the call was from a debt collector.

12. 15 U.S.C. § 1692d(6) requires a debt collector to provide a meaningful disclosure of identity in each communication with a consumer.

13. In both of the messages, the Collector failed to provide this meaningful disclosure because it did not state the name of the Collector, or the purpose of the call.

14. The messages were attempts to collect the Account.

15. Defendant violated the Act, 15 U.S.C. § 1692, subsections d(6) and e(11).

WHEREFORE, Plaintiff demands judgment against Defendant for damages, costs, attorney's fees, and such other and further relief as the Court deems just and

proper.

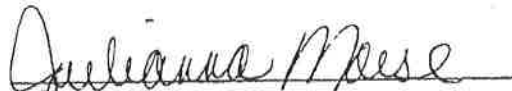
Respectfully Submitted,



Carlo Sabatini  
Bar Number 83831  
Attorney for Plaintiff  
Sabatini Law Firm, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
Phone (570) 341-9000

**Verification by Plaintiff Julianna Morse**

I affirm that the averments of fact contained in this pleading are true upon my personal knowledge or information and belief.

  
Julianna Morse